187364

Bruner, Powell, Robbins, Wall & Mullins, LLC

ATTORNEYS AND COUNSELORS AT LAW 1735 St. Julian Place, Suite 200 POST OFFICE BOX 61110 COLUMBIA, SOUTH CAROLINA 29260-1110 TELEPHONE (803) 252-7693 FAX (803) 254-5719 WWW.BPRWM.COM

BRIAN P. ROBINSON, P.A. WESLEY D. PEEL, P.A. JOEY R. FLOYD, P.A.

OF COUNSEL: WILLIAM D. BRITT, JR.

AUTHOR'S E-MAIL: wmullins@bprwm.com

JAMES L. BRUNER, P.A. WARREN C. POWELL, JR., P.A.* RONALD E. ROBBINS, P.A. HENRY P. WALL, P.A. E. WADE MULLINS, III, P.A.

* Also Admitted in District of Columbia

July 23, 2007

VIA HAND DELIVERY

The Honorable Charles L.A. Terreni Chief Clerk/Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

#2 10-31-07 10-30am

RE:

Application of South Carolina Electric & Gas Company for Adjustments and

Increases in the Company's Electric Rate Schedules and Tariff

Docket No. 2007-229-E

Petition to Intervene of CMC Steel South Carolina

Dear Mr. Terreni:

Enclosed for filing please find the original and ten (10) copies of the Petition to Intervene of CMC Steel South Carolina in the above referenced matter. I have also enclosed an extra copy of the petition and would appreciate you file stamping the extra copy and returning it to me via courier. By copy of this letter, I am serving all parties of record. If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,

E. Wade Mullins, III

EWM/rdd **Enclosures**

Belton T. Zeigler, Esquire (w/enc.) cc:

Catherine D. Taylor, Esquire (w/enc.)

K. Chad Burgess, Esquire (w/enc.)

Mitchell M. Willoughby, Esquire (w/enc.)

Nannette S. Edwards, Esquire (w/enc.)

Shannon Bowyer Hudson, Esquire (w/enc.)

Damon E. Xenopoulos, Esquire

JUL 2 3 2007

PSC SC DOCKETING DEPT

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2007-229-E

IN RE:)	
)	
Application of South Carolina Electric)	PETITION TO INTERVENE
and Gas Company for Adjustments and)	OF CMC STEEL SOUTH
Increases in the Company's Electric Rate)	CAROLINA
Schedules and Tariff)	

CMC Steel South Carolina ("CMC") hereby petitions to intervene in the above-captioned proceeding. CMC states the following grounds in support of its petition.

- 1) CMC owns and operates a steel manufacturing facility in Cayce, South Carolina. This facility utilizes an electric arc furnace ("EAF") to melt and recycle steel. This process requires CMC to purchase very large quantities of electricity from South Carolina Electric & Gas Company ("SCE&G") at a cost of millions of dollars a year. Because the cost of electricity is one of the major costs of steel-making utilizing an EAF, the cost of electric power directly affects CMC's ability to produce steel at a competitive price. CMC is one of the largest retail customers of SCE&G.
- 2) The Commission has instituted this proceeding to consider SCE&G's application for adjustments and increases to SCE&G's electric rates. Due to the magnitude and unique characteristics of its load, CMC cannot be represented adequately by any other party to this proceeding. At this stage of the proceeding, CMC has not fully determined what positions it may take.

3) CMC's mailing address is:

4)

CMC Steel South Carolina 310 New State Road Cayce, SC 29033

CMC is represented by the Washington, D.C. law firm of Brickfield, Burchette, Ritts & Stone, P.C. in various matters regarding electric rates and service. In the past few years, attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and many other state utility commissions. In accordance with Rule 103-804 S.(1)(b) of the Commission's Rules of Practice and Procedure, Brickfield, Burchette, Ritts & Stone, P.C. will associate with E. Wade Mullins, III, Esq. and William D. Britt, Jr., Esq. of

Carolina. Service and correspondence regarding this proceeding should be sent to all of the undersigned.

Bruner, Powell, Robbins, Wall & Mullins, LLC, local counsel licensed to practice in South

WHEREFORE, for the reasons set forth above, CMC respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

E. Wade Mullins, III, Esquire William D. Britt, Jr., Esquire

Bruner, Powell, Robbins, Wall & Mullins, LLC

P.O. Box 61110

Columbia, South Carolina 29260

(803) 252-7693

Damon E. Xenopoulos, Esquire BRICKFIELD, BURCHETTE, RITTS & STONE. P.C. 1025 Thomas Jefferson Street, N.W. Eighth Floor -- West Tower Washington, D.C. 20007 (202) 342-0800

Attorneys for CMC Steel South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

Docket No. 2007-229-E

IN RE:)	
)	
Application of South Carolina Electric)	CERTIFICATE OF SERVICE
and Gas Company for Adjustments and)	•
Increases in the Company's Electric Rate)	
Schedules and Tariff)	

This is to certify that I have caused to be served this day ten (10) copies of the **Petition to Intervene of CMC Steel South Carolina** via hand delivery to the persons named below at the addresses set forth below:

K. Chad Burgess, Esquire Catherine D. Taylor, Esquire SCE&G Company 1426 Main Street, M/C130 Columbia, SC 29201

Mitchell M. Willoughby, Esquire Willoughby & Hoefer, PA 930 Richland Street Columbia, SC 29072 Nannette S. Edwards, Esquire Shannon Bowyer Hudson, Esquire Office of Regulatory Staff 1441 Main Street, Suite 300 Columbia, SC 29201

THE PROPERTY SO

Belton T. Zeigler, Esquire Haynsworth Sinkler & Boyd, PA 1201 Main Street, Suite 2200 Columbia, SC 29201

Rita D. DeCarlis

Legal Assistant to E. Wade Mullins, III

Columbia, South Carolina This 23rd day of July 2007